



July 20, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 00-258
IB Docket No. 99-81

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this is to notify you that on July 19, 2004, Steve Sharkey and Rob Kubik of Motorola met with Blaise Scinto, Gary Michaels, Eli Johnson, Marty Liebman, Mary Woytek, Brian Carter, Peter Corea, John Spencer, Joseph Levin, Tom Derenge, Cathy Seidel, Tom Stanley, Peter Trachtenburg, Nese Guendelsberger and Harry Wingo of the Wireless Telecommunications Bureau regarding the above captioned proceeding.

During the meeting, Motorola discussed the attached presentation and expressed its view, consistent with its comments in this proceeding, that paired use of the 1915-1920 MHz and 1995-2000 MHz bands to create an "H-block" extension of the existing PCS band is problematic. Such use would reduce the PCS duplex gap to only 10 MHz and Motorola believes that this is insufficient to limit interference from PCS mobiles to PCS mobile receivers operating above 1930 MHz to levels found acceptable in industry standards efforts. In addition, it would provide no guardband between the H-block mobile receive band at 1995-2000 MHz and the Mobile Satellite Service mobile transmit band at 2000-2020 MHz, resulting in potential interference to both PCS and MSS ancillary terrestrial base stations.

Decisions to be taken under this proceeding impact the 2155-2180 MHz band, Motorola's view is that this band should be made available unpaired under rules consistent for Advanced Wireless Service base station transmitters. Such an arrangement, using blocks of at least 5 MHz, would provide the potential for the spectrum to be used in several ways, including for operators to pair the spectrum with other AWS spectrum, thereby creating an asymmetric uplink/downlink pairing to accommodate greater amounts of downlink traffic, or to provide broadcast-type service to mobile devices. The 2155-2180 MHz band represents enormous potential for expanding the consumer benefits by creating a 2110-2180 MHz downlink band that is harmonized with existing international allocations for third generation ("3G") wireless services. Use of any portion of the 2110-2180 MHz band for mobile transmit would create interference problems in the band and would not align with internationally harmonized uses of the band.



MOTOROLA

Pursuant to the Commission's Rules, one copy of this notice is being filed electronically with the Commission. If you require any additional information please contact the undersigned at (202) 371-6953.

Sincerely,

/s/ Steve B. Sharkey

Steve B. Sharkey, Director
Director, Spectrum and Standards Strategy

Cc: Blaise Scinto
Gary Michaels
Eli Johnson
Marty Liebman
Mary Woytek
Brian Carter
Peter Corea
John Spencer
Joseph Levin
Tom Derenge
Cathy Seidel
Tom Stanley
Peter Trachtenburg
Nese Guendelsberger
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